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January 8, 1999

BY HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S. W.
Washington, D.C. 20554

EX PARTE OR LATE FILED

**Re: Notice of Ex Parte Communication Regarding Telephone
Number Portability, CC Docket No. 95-116 ✓**

**North American Numbering Council Report Concerning
Telephone Number Pooling and Other Optimization
Measures, NSD File No. L-98-134**

Dear Ms. Salas:

Yesterday, on behalf of the Telecommunications Resellers Association ("TRA"), the undersigned of Hogan and Hartson L.L.P.; David Gusky, Vice President and Director of Wireless Services, TRA; Steven Trotman, Director of Local Resale Services, TRA; and Earl Comstock, Sher and Blackwell; met with Patrick Forster, Blaise Scinto, Les Seltzer, and Gayle Radley Teicher of the Common Carrier Bureau and with David Furth of the Wireless Telecommunications Bureau, regarding the referenced proceedings.

The purpose of the meeting was to discuss TRA's comments in the referenced proceedings. TRA filed comments on December 21, 1998, on the North American Numbering Council Report on Telephone Number Pooling and Other

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Optimization Measures (NSD File No. L-98-134), discussing the number conservation benefits of wireless number portability. TRA also filed comments opposing the request for forbearance from implementation of wireless number portability filed on December 16, 1997, by the Cellular Telecommunications Industry Association, CC Docket No. 95-116.

As noted in the meeting, TRA strongly supports speedy implementation of wireless number portability, and opposes the grant of CTIA's forbearance request. TRA emphasized the importance of careful Commission consideration of the implications of any delay in implementation of wireless number portability -- for consumers, for competition, and for number conservation efforts. TRA noted that consumers in the United Kingdom already have the benefits of wireless number portability, which was implemented by four wireless carriers there effective January 1, 1999. A copy of the Oftel press release announcing the successful implementation of number portability in the U.K. is attached to this letter.

TRA also discussed its alternative plan -- using location routing number methodology -- for implementing wireless number portability. This plan ("LRN-Relay") was described in detail in a TRA report filed on November 24, 1998, in CC Docket No. 95-116. The costs of this method for achieving number portability are significantly lower than the costs associated with the MIN/MDN methodology being pursued by the industry. The LRN-Relay method meets each of the Commission's criteria for number portability and would permit the industry to meet the FCC's current March 31, 2000 implementation deadline.

TRA emphasized that in addition to the consumer and competitive benefits associated with wireless number portability, prompt implementation of wireless number portability would greatly assist the Commission in its efforts to promote conservation of scarce numbering resources. With wireless carriers making up an increasing proportion of the total demand for numbering resources, it would be unreasonable for the Commission to exclude wireless carriers from the responsibility to implement number portability as a means to help conserve numbers and use them more efficiently.

HOGAN & HARTSON L.L.P.

Ms. Magalie R. Salas

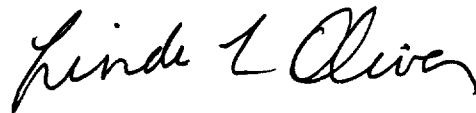
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I have hereby submitted two copies of this notice to the Secretary, as required by the Commission's rules. Please return a date-stamped copy of the enclosed (copy provided).

Please contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script, reading "Linda L. Oliver".

Linda L. Oliver
Counsel for Telecommunications
Resellers Association

Enclosure

cc: Patrick Forster
Blaise Scinto
Les Seltzer
Gayle Radley Teicher
David Furth



Office of Telecommunications

83/98 30 December 1998

MOBILE PHONE SHOPPERS CAN KEEP THEIR OLD NUMBER AFTER SWITCHING NETWORKS

From January mobile phone users will be able to keep their existing phone number when moving to another mobile operator. The UK is the first country in the world to give customers this ability.

All four mobile phone networks have complied with OFTEL's plan to allow customers to take their number with them if they change operators. In the past, having to get a new number has put off customers from shopping around for the best deal.

David Edmonds, the Director General of Telecommunications said:

"This will encourage much more intense competition in the mobile market as the four companies fight to win and retain customers. In the end, the winner will be the customer."

The operators will be allowed to charge customers to cover the costs of transferring the number but we do not expect it to be more than a one-off charge of #25. The four mobile operators can be contacted for more details.

Notes to editors

All four operators - Orange, Vodafone, Cellnet and One2One - agreed to licence amendments in 1997 requiring them to provide number portability from January 1999.

ENDS

= pounds sterling